

SHEA & SHEA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHAD NICHOLAS,
Plaintiff,

vs.

UNITED AIR LINES, INC., and DOES 1
through 50, inclusive,
Defendants.

DOCKET No. C 09-02089 RS

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING NON-EXPERT DISCOVERY
AND EXPERT DISCOVERY**

The parties have met and conferred and have agreed to stipulate as follows:

1. That the parties shall be allowed to conduct certain discovery beyond the May 19, 2010 discovery cut-off. The discovery which is permitted to take place after May 19, 2010 includes:
 - a. Any depositions noticed before the May 19, 2010 discovery cut off;
 - b. The deposition of Shirley Nicholas;
 - c. Plaintiff will agree to produce updated medical records as his treatment continues.
2. Due to the unavailability of certain deponents until after June 1, the parties have agreed to postpone expert disclosures & discovery as follows:

- Dated: June 1, 2010

/s/

NICOLE N. HANCOCK, ESQ.
Attorneys for Plaintiff
CHAD NICHOLAS

/s/

ELIZABETH RHODES, ESQ.
Attorneys for Defendant
UNITED AIR LINES, INC.

Dated: 6/2/10


UNITED STATES MAGISTRATE JUDGE